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7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
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11
12 **Cordelia Lighting, Inc.**, a California
corporation,

13 Plaintiff,

14 v.

15 **Zhejiang Yankon Group Co., Ltd.**
16 **d/b/a Energetic Lighting**, a China
company, and **Yankon Industries Inc.**,
17 a California corporation,

18 Defendants.
19
20

Case No. 14-3388

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

21 For its Complaint, Plaintiff Cordelia Lighting, Inc. (“Cordelia”) alleges as
22 follows:

23 **JURISDICTION AND VENUE**

24 1. This is an action for infringement under the patent laws of the United
25 States, 35 U.S.C. § 101, *et. seq.* This Court has subject matter jurisdiction over the
26 patent claims of this action under 28 U.S.C. §§ 1331 and 1338(a).
27
28

1 2. This Court has personal jurisdiction over the Defendants because each
2 regularly conducts business in California and has committed the infringing acts
3 alleged herein in California.

4 3. Venue is proper in this Judicial District under 28 U.S.C. §§ 1391(b)-(c)
5 and 1400.

6 **PARTIES**

7 4. Plaintiff Cordelia is a California corporation having its principal place
8 of business in Rancho Dominguez, California.

9 5. Upon information and belief, Defendant Zhejiang Yankon Group Co.,
10 Ltd., is a business entity in China, doing business as “Energetic Lighting” and
11 having a principal place of business in the U.S. at 13445 12th Street, Chino,
12 California 91710, and an Internet address at <www.energeticlighting.com>.

13 6. Upon information and belief, Defendant Yankon Industries Inc. is a
14 California corporation, doing business as “Energetic Lighting” and having a
15 principal place of business in the U.S. at 13445 12th Street, Chino, California 91710,
16 and an Internet address at <www.energeticlighting.com>.

17 **GENERAL ALLEGATIONS**

18 7. On June 4, 2013, U.S. Patent No. 8,454,204 (“the ‘204 patent”) entitled
19 “Recessed LED Lighting Fixture” issued to Plaintiff. A true and correct copy of the
20 ‘204 patent is attached hereto as Exhibit A.

21 8. Defendants have made, used, offered for sale, sold, and/or imported
22 products that infringe the ‘204 patent, including the “Utilitec Pro LED Recessed
23 Retrofit Downlight” in 4-inch and 5- or 6-inch housing sizes (“the Accused
24 Products”). Attached hereto as Exhibit B is a true and correct copy of a photograph
25 of this product.

26 9. To the extent that either Defendant has not directly infringed the ‘204
27 patent, it has actively induced and contributed to the direct infringement.
28

FIRST CLAIM FOR RELIEF

(Infringement of U.S. Patent No. 8,454,204)

10. Plaintiff incorporates by this reference all of the allegations stated in the above paragraphs.

11. By the acts of making, using, offering to sell, selling and/or importing the Accused Products, each Defendant has directly infringed the '204 patent under 35 U.S.C. § 271(a).

12. By the acts of actively inducing others to infringe the '204 patent, each Defendant has infringed the '204 patent under 35 U.S.C. § 271(b).

13. By the acts of providing components used in practicing the inventions claimed in the '204 patent, each Defendant has infringed the '204 patent under 35 U.S.C. § 271(c).

14. At least since September 2013, and the filing and service of this action, each Defendant has known about the '204 patent, and each Defendant's acts of infringement asserted herein have been and continue to be deliberate and willful.

15. Each Defendant has derived and received gains, profits and advantages from the aforesaid acts of infringement, and Plaintiff has lost profits and has otherwise been damaged and is entitled to monetary relief in an amount to be determined at trial.

16. Defendants' infringement of the '204 patent has caused and continues to cause irreparable harm to Plaintiff, for which there is no adequate remedy at law, and the infringement will continue unless and until it is preliminarily and permanently enjoined by this Court.

PRAYER FOR RELIEF

Therefore, Plaintiff Cordelia prays for the following relief:

A. A determination that each Defendant has infringed the '204 patent under 35 U.S.C. § 271;

1 B. A preliminary and permanent injunction against the continuing patent
2 infringement;

3 C. An accounting for damages adequate to compensate for the patent
4 infringement, including Plaintiff's lost profits and amounts attributable to
5 Defendants' unjust enrichment, pre-judgment and post-judgment interest, and costs;

6 D. An award of reasonable attorney fees and expenses to Plaintiff;

7 E. Such other and further relief as this Court deems just and proper.

8 Respectfully submitted,

9 Dated: May 1, 2014

THE ECLIPSE GROUP LLP

11 /s/ Paul Y. Feng

12 Paul Y. Feng
Stephen M. Lobbin

13 Attorneys for Plaintiff **Cordelia Lighting, Inc.**

JURY TRIAL DEMAND

Pursuant to Fed. R. Civ. P. 38(b)(1) and (c), and L.R. 38-1, Plaintiff Cordelia Lighting, Inc. hereby demands a jury trial on all the issues in this action so triable of right by a jury.

Dated: May 1, 2014

Respectfully submitted,

THE ECLIPSE GROUP LLP

/s/ Paul Y. Feng

Paul Y. Feng
Stephen M. Lobbin

Attorneys for Plaintiff **Cordelia Lighting, Inc.**